



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 08 2008

REPLY TO THE ATTENTION OF:

A-18J

Laurel L. Kroack
Chief
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

Dear Ms. Kroack:

I am writing in follow up to our annual joint air program planning meeting with you and your staff on July 29, 2008, via videoconference. We appreciated the opportunity to hold this productive dialogue and your sustained commitment to environmental progress. Overall, I am pleased with the work you do to protect and improve air quality in Illinois. I look forward to working with you to ensure the continued success of your Air Pollution Control Program; and on our joint priority, the Midwest Clean Diesel Initiative.

The enclosed summary identifies action items resulting from our meeting. I hope our discussions and agreements to work together on ongoing programmatic elements will strengthen the foundation of our partnership and help ensure even greater successes in the future toward continued air quality improvement in Illinois.

If you have any concerns, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton".

Cheryl L. Newton
Acting Director
Air and Radiation Division

Enclosure

**ACTION ITEMS FROM JULY 29, 2008
IEPA/EPA AIR PLANNING VIDEO CONFERENCE CALL**

Midwest Clean Diesel Initiative (MCDI) (Joint Priority):

MCDI Leadership Group (October/November 2008)

- Develop agenda and plans for November 13, 2008 Leadership Group Meeting in Chicago (IEPA and Region 5 are co-chairs along with Cummins and American Lung Association - Upper Midwest)
- Develop materials specific to the Illinois coalition for presentation at the Leadership Group meeting
- Review applications and select organizations to be recognized as part of the MCDI Leadership Recognition program

Timeframe: October – November 2008

Contacts: Darwin Burkhardt (IEPA) and Steve Marquardt (EPA)

MCDI Generally

- Continue efforts to generate clean diesel funding sources including Supplemental Environmental Projects and Congestion Mitigation and Air Quality funds to create a comprehensive clean diesel program (ongoing)
- Develop an Illinois coalition workplan to describe the efforts in terms of geography, sectors, technologies, and funding sources (October 2008)
- EPA to award the FY 2008 State Clean Diesel Grant and any competitive grants as appropriate (October – November 2008)

Timeframe: Ongoing

Contacts: Darwin Burkhardt (IEPA) and Steve Marquardt (EPA)

Air Toxics:

EPA will continue to consult with IEPA on the Mapleton Pekin Air Toxics project.

Timeframe: Ongoing

Contacts: Jeff Sprague (IEPA) and Suzanne King (EPA)

EPA will convene regular climate change conference calls with the 6 states.

Timeframe: Beginning in early FY 2009

Contacts: Jim Ross (IEPA) and Melissa Hulting (EPA)

EPA will arrange for a conference call or meeting with IEPA on Maximum Available Control Technology (MACT) delegation-administrative record.

Timeframe: October 2008

Contacts: Dixon Nwaji (IEPA) and Rae Trine (EPA)

IEPA will consider assigning a manager and staff member to the Great Lakes Mercury Phase-Down strategy workgroups.

Timeframe: December 31, 2008

Contact: Laurel Kroack

Air Monitoring:

EPA Region 5 Ambient Monitoring and Analysis Section will follow closely the Photochemical Assessment Monitoring Stations Workgroup efforts, e.g., comment on Office of Air Quality Planning and Standards (OAQPS) draft recommendations, develop a regional approach (consensus) and plan after recommendations are implemented or become final for rule making.

Timeframe: March 31, 2009

Contact: Loretta Lehrman (EPA)

OAQPS has indicated they are planning to revise ozone monitoring requirements. It may require ozone monitoring in smaller cities and include background and transport sites. EPA Region 5 Ambient Monitoring and Analysis Section will follow closely and provide recommendations to the draft rule.

Timeframe: March 31, 2009

Contact: Michael Compher (EPA)

The proposed National Ambient Air Quality Standard (NAAQS) for Lead (Pb) air monitoring will require close review. After promulgation (October 2008) regional monitoring requirements need to be defined. The sampling method Total Suspended Particulates/Particulate Matter (PM)₁₀ microns for source/population monitoring needs to be discussed and resolved. Some regional consistency is required.

Timeframe: March 31, 2009

Contact: Motria Caudill (EPA)

IEPA's Air Monitoring Work Plan under the Performance Partnership Agreement is the "Proposed 2009 Illinois Air Monitoring Network Plan" submitted to EPA for their approval on July 1, 2008. This plan, once approved, will take effect January 1, 2009. The BioWatch work plan for Homeland Security is included in IEPA's Department of Homeland Security grant application which was submitted and approved August 1, 2008 and continues until July 31, 2009. EPA will complete review of Proposed 2009 Illinois Air Monitoring Plan.

Timeframe: December 31, 2008

Contact: Loretta Lehrman

Compliance/Enforcement:

Current Compliance Monitoring Strategy (CMS) Status:

Total CMS Sources = 247/299 = 82.61%

Title V Majors CMS Sources = 219/266 = 82.33%

Synthetic Minor 80's = 28/33 = 84.85%

Updates on CMS status will be provided to EPA.

Timeframe: Ongoing

Contact: Ray Pilipal (IEPA)

IEPA requested an inspection checklist and/or inspection guidance for developing the write-up for their inspection reports. EPA will send the information once we have gathered all documents relevant to their request.

Timeframe: Completed

Contacts: Dean Hayden (IEPA) and Brent Marable (EPA)

IEPA has informed EPA that the programming to report all of the stack test data, a minimum data requirement, will be completed and reported to EPA for FY 2008.

Timeframe: October 30, 2008

Contacts: Ray Pilipal (IEPA) and Rochelle Marceillars (EPA)

IEPA could not commit to linking the discovery date, a minimum data requirement, within the High Priority Violators (HPV) pathway in the Air Facility Subsystem (AFS). Even though the data has already been reported to the AFS but not linked, IEPA stated they have limited resources to perform this duty at this time. IEPA will continue their effort to resolve this issue.

Timeframe: FY 2009

Contacts: Ray Pilipal (IEPA) and Rochelle Marceillars (EPA)

EPA requested IEPA provide updates for HPV in State lead cases in AFS. By providing such updates it will limit time spent by IEPA to (1) provide updates quarterly to State cases on Headquarters' Watch List; (2) discuss all State lead cases on the regularly scheduled enforcement conference call; and (3) provide EPA oversight of the State enforcement program. IEPA has committed one way or the other to provide EPA with updates.

Timeframe: FY 2008

Contacts: Ray Pilipal (IEPA) and Rochelle Marceillars (EPA)

Permits:

The Bureau of Air will continue to update the Reasonably Available Control Technology(RACT)/Best Available Control Technology/Lowest Achievable Emission Rate Clearinghouse within 120 days after the permit is issued or effective.

Timeframe: Ongoing

Contacts: Ed Bakowski (IEPA) and Pamela Blakley (EPA)

IEPA commits to address its backlog of pending Title V renewal, initials and significant mods.

Timeframe: Ongoing

Contact: Ed Bakowski (IEPA)

Criteria Pollutants:

EPA acknowledges that the Court vacature of CAIR has adversely affected the ozone and PM2.5 planning efforts of the Lake Michigan States, including Illinois. Draft Lake Michigan Air Directors Consortium (LADCO) modeling shows this to be particularly

problematic for attainment of the PM_{2.5} standards and Regional Haze efforts, with less significant impacts on the ozone attainment plans and demonstrations. EPA encourages Illinois to work with LADCO to formalize reports covering the new modeling analyses to support State finalization and EPA review of the ozone attainment demonstrations.

Timeframe: Quarterly

Contacts: Rob Kaleel (IEPA) and Ed Doty (EPA)

EPA encourages Illinois, along with other LADCO States, to continue with multi-pollutant Electric Generating Unit (EGU) control planning rule development to offset the loss of CAIR requirements. If needed, additional State-specific rule development should be considered to compensate for the loss of CAIR.

Timeframe: Quarterly

Contacts: Rob Kaleel (IEPA) and Ed Doty (EPA)

EPA continues to note that IEPA has missed the deadline for the submittal of the State's Nitrogen Oxides (NO_x) Reasonably Available Control Technology (RACT) rules. We understand that Illinois EPA is making progress in the development of these rules and is developing and adopting these rules as quickly as possible and is expected to submit these rules in 2008 or early 2009. Nonetheless, we must note that these rules will be important for our review and approval of Illinois' ozone and fine particulate (PM_{2.5}) attainment plans.

Timeframe: Quarterly

Contacts: Rob Kaleel (IEPA) and Ed Doty (EPA)

IEPA proposed nonattainment area boundaries for the revised 24-hour PM_{2.5} NAAQS in December 2007 and EPA responded to these recommendations in August 2008. EPA expects to finalize PM_{2.5} nonattainment boundaries in December 2008 after considering additional information submitted by the state and others during the comment period. IEPA will propose nonattainment area boundaries for the revised 8-hour ozone NAAQS in March 2009.

Timeframe: Ongoing

Contact: Rob Kaleel (IEPA) and Ed Doty (EPA)

The Regional Haze SIPs for all Midwestern States have been impacted greatly by the vacatur of CAIR. The Bureau of Air will continue to work with LADCO and other Midwestern States to develop and actively participate in a process to address the requirements of the 1999 Regional Haze Rule.

Timeframe: Ongoing

Contact: Rob Kaleel (IEPA) and John Summerhays (EPA)

EPA will work with IEPA to provide guidance on the development of an ozone redesignation request for the Chicago area to ensure that the request can be processed in a timely manner.

Timeframe: Ongoing

Contact: Rob Kaleel (IEPA) and Ed Doty (EPA)

Grants:

IEPA will review various air program funding levels for Cook County Department of Environment to ensure that correct amounts are allotted to them.

Timeframe: Ongoing

Contact: Laurel Kroack (IEPA)

standard bcc's:

official file copy w/attachment(s)
originator's file copy w/attachment(s)

other bcc's:

C. Newton via email
J. Bortzer via email
P. Blakley via email
J. Mooney via email
D. Nelson via email
G. Czerniak via email
B. Marable via email
M. Tyson via email
L. Lehrman via email
C. Nash via email